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11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 IN RE: AMERANTH PATENT
14 LITIGATION

15 Lead Case No. 11cv1810 DMS (WVG)

16 **JOINT MOTION TO EXTEND TIME TO
17 INITIATE DISCOVERY CONFERENCE
18 REGARDING THE PRODUCTION OF
19 SOURCE CODE**

20 Complaint Filed: August 15, 2011

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INTRODUCTION

Ameranth, Inc. (“Ameranth”) and Oracle Corporation (“Oracle”) jointly move the Court for a thirty (30) day extension of time to initiate any necessary discovery conference with the Court pursuant to the Court’s Chamber Rules regarding Oracle’s production of source code.

BACKGROUND

Pursuant to the Court’s Amended Case Management Order, Oracle was directed to begin making source code for its accused system available for inspection on April 7, 2017. Ameranth’s expert consultant conducted an initial review of the source code on April 27, 2017. During Ameranth’s initial review of the source code and review computer and tools provided, Ameranth’s consultant encountered certain problems and issues. These problems and issues were communicated to counsel for Oracle, and the parties are actively working on resolving them in order that Ameranth’s review of the source code may proceed. Additional substantial review of the source code is still required.

In order to provide the parties with sufficient time to resolve these issues and problems and for Ameranth to proceed with review of Oracle’s source code, Ameranth and Oracle are hereby jointly requesting a 30 day extension of time to any deadline for initiating a discovery dispute with the Court regarding the source code production under the Court’s Chamber Rules. The extension is of the same length previously granted by the Court to all defendants to initiate any discovery motions regarding Ameranth’s Infringement Contentions.

CONCLUSION

Based on the foregoing, Ameranth and Oracle jointly request that the Court grant a thirty (30) day extension of time to initiate discovery conference with the Court regarding Oracle's production of source code.

Respectfully submitted,

Dated: May 3, 2017

CALDARELLI HEJMANOWSKI PAGE & LEER LLP

By:/s/ William J. Caldarelli

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Dated: May 3, 2017

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By: /s/ Brian Chang

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